

## **EXHIBIT A**



Werner Enterprises, Inc.  
Sandy Wagner  
Werner Enterprises  
14507 Frontier Road  
Omaha NE 68138

Jones, Jimmy  
2020672982  
11-19-20  
LM  
Ath MP

02/11/2022

## SERVICE OF PROCESS NOTICE

The following is a courtesy summary of the enclosed document(s). **ALL information should be verified by you.**

Item: 2022-32

Note: Any questions regarding the substance of the matter described below, including the status or how to respond, should be directed to the contact set forth in line 12 below or to the court or government agency where the matter is being heard. **IMPORTANT:** All changes or updates to the SOP contact individuals or their contact information must be submitted in writing to [SOPcontact@corpcreations.com](mailto:SOPcontact@corpcreations.com). Any changes will become effective upon written confirmation of Corporate Creations.

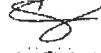
1.	<b>Entity Served:</b>	Werner Enterprises, Inc.	
2.	<b>Title of Action:</b>	Laterica Finley vs. Jimmy Lee Jones and Werner Enterprise, Inc.	
3.	<b>Document(s) Served:</b>	Sheriff's Entry of Service Summons Disclosure Statement General Civil and Domestic Relations Case Disposition Information Form	
4.	<b>Court/Agency:</b>	Cobb County Superior Court	
5.	<b>State Served:</b>	Georgia	
6.	<b>Case Number:</b>	22100849	
7.	<b>Case Type:</b>	Negligence/Personal Injury	
8.	<b>Method of Service:</b>	Hand Delivered	
9.	<b>Date Received:</b>	Thursday 02/10/2022	
10.	<b>Date to Client:</b>	Friday 02/11/2022	
11.	<b># Days When Answer Due:</b> <b>Answer Due Date:</b>	30 Saturday 03/12/2022	<b>CAUTION:</b> Client is solely responsible for verifying the accuracy of the estimated Answer Due Date. To avoid missing a crucial deadline, we recommend immediately confirming in writing with opposing counsel that the date of the service in their records matches the Date Received.
12.	<b>Sop Sender:</b> (Name, City, State, and Phone Number)	Sanford Hill Summerville, GA 706-859-7777	
13.	<b>Shipped To Client By:</b>	Email Only with PDF Link	
14.	<b>Tracking Number:</b>		
15.	<b>Handled By:</b>	111	
16.	<b>Notes:</b>	Also Attached: * Complaint * Exhibit "A"	

**NOTE:** This notice and the information above is provided for general informational purposes only and should not be considered a legal opinion. The client and their legal counsel are solely responsible for reviewing the service of process and verifying the accuracy of all information. At Corporate Creations, we take pride in developing systems that effectively manage risk so our clients feel comfortable with the reliability of our service. We always deliver service of process so our clients avoid the risk of a default judgment. As registered agent, our role is to receive and forward service of process. To decrease risk for our clients, it is not our role to determine the merits of whether service of process is valid and effective. It is the role of legal counsel to assess whether service of process is invalid or defective. Registered agent services are provided by Corporate Creations Network Inc.



**SUPERIOR COURT OF COBB COUNTY  
STATE OF GEORGIA**

ID# 2022-0017117-CV  
EFILED IN OFFICE  
CLERK OF SUPERIOR COURT  
COBB COUNTY, GEORGIA  
**22100849**  
Ann B. Harris - 56  
FEB 08, 2022 08:56 AM

  
Connie Taylor, Clerk of Superior Court  
Cobb County, Georgia

CIVIL ACTION NUMBER 22100849

\$214.00 COST PAID

FINLEY, LATERICA

**PLAINTIFF**

**VS.**

JONES, JIMMY LEE  
WERNER ENTERPRISE, INC., DBA C/O  
CORPORATE CREATIONS NETWORK,  
INC.

**DEFENDANTS**

**SUMMONS**

TO: WERNER ENTERPRISE, INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Sanford Hill  
Law Offices, PC  
P.O. Box 140  
136 Highway 48  
Summerville, Georgia 30747

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 8th day of February, 2022.

Clerk of Superior Court



Connie Taylor, Clerk of Superior Court  
Cobb County, Georgia

**COPY**

**SUPERIOR COURT OF COBB COUNTY  
STATE OF GEORGIA**

ID# 2022-0017116-CV  
EFILED IN OFFICE  
CLERK OF SUPERIOR COURT  
COBB COUNTY, GEORGIA  
**22100849**  
Ann B. Harris - 56  
FEB 08, 2022 08:56 AM

  
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**PLAINTIFF**

VS.

JONES, JIMMY LEE  
WERNER ENTERPRISE, INC., DBA C/O  
CORPORATE CREATIONS NETWORK,  
INC.

**DEFENDANTS**

**SUMMONS**

TO: JONES, JIMMY LEE

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Sanford Hill  
Law Offices, PC  
P.O. Box 140  
136 Highway 48  
Summerville, Georgia 30747

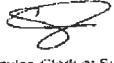
an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 8th day of February, 2022.

Clerk of Superior Court



Connie Taylor, Clerk of Superior Court  
Cobb County, Georgia

ID# 2022-0017119-CV  
 EFILED IN OFFICE  
 CLERK OF SUPERIOR COURT  
 COBB COUNTY, GEORGIA  
**22100849**  
 Ann B. Harris - 56  
 FEB 08, 2022 08:56 AM  
  
 Connie Taylor, Clerk of Superior Court  
 Cobb County, Georgia

DISCLOSURE STATEMENT  
 CLERK OF SUPERIOR COURT

CASE NUMBER 22100849

FINLEY, LATERICA

Plaintiff

Vs.

JONES, JIMMY L; WERNER ENTERPRISE, INC.

Defendant

TYPE OF ACTION

- Divorce without Agreement Attached
- Divorce with Agreement Attached
- Domestic Relations
- Damages Arising out of Contract
- Damages Arising out of Tort
- Condemnation
- Equity
- Zoning – County Ordinance Violations (i.e., Injunctive Relief-Zoning)
- Zoning Appeals (denovo)
- Appeal, Including denovo appeal – excluding Zoning
- URESA
- Name Change
- Other
- Recusal
- Adoption

PREVIOUS RELATED CASES

Does this case involve substantially the same parties, or substantially the same subject matter, or substantially the same factual issues, as any other case filed in this court (Whether pending simultaneously or not)?

NO  
 YES – If yes, please fill out the following:

1. Case # \_\_\_\_\_

2. Parties \_\_\_\_\_

3. Assigned Judge \_\_\_\_\_

4. Is this case still pending?  Yes  No

5. Brief description of similarities:

/S/ Hill, Sanford

Attorney or Party Filing Suit

## General Civil and Domestic Relations Case Filing Information Form

 Superior or  State Court of Cobb

County

## For Clerk Use Only

Date Filed 02-08-2022

Case Number 22100849

MM-DD-YYYY

Connie Taylor, Clerk of Superior Court  
Cobb County, Georgia

## Plaintiff(s)

FINLEY, LATERICA

Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney Hill, Sanford

## Defendant(s)

JONES, JIMMY LEE

Last	First	Middle I.	Suffix	Prefix
WERNER ENTERPRISE, INC.				
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix

Bar Number 354505

Self-Represented 

Check one case type and, if applicable, one sub-type in one box.

## General Civil Cases

- Automobile Tort
- Civil Appeal
- Contract
- Contempt/Modification/Other
- Post-Judgment
- Garnishment
- General Tort
- Habeas Corpus
- Injunction/Mandamus/Other Writ
- Landlord/Tenant
- Medical Malpractice Tort
- Product Liability Tort
- Real Property
- Restraining Petition
- Other General Civil

## Domestic Relations Cases

- Adoption
- Contempt
- Non-payment of child support, medical support, or alimony
- Dissolution/Divorce/Separate Maintenance/Alimony
- Family Violence Petition
- Modification
- Custody/Parenting Time/Visitation
- Paternity/Legitimation
- Support – IV-D
- Support – Private (non-IV-D)
- Other Domestic Relations

Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

Do you or your client need any disability accommodations? If so, please describe the accommodation request.

## SHERIFF'S ENTRY OF SERVICE

Civil Action No. 22100849

Superior Court	<input checked="" type="checkbox"/>	Magistrate Court	<input type="checkbox"/>
State Court	<input type="checkbox"/>	Probate Court	<input type="checkbox"/>
Juvenile Court	<input type="checkbox"/>		

Date Filed \_\_\_\_\_

Georgia. COBB COUNTY  
FINLEY, LATERICAAttorney's Address Hill, Sanford  
Law Offices, PC  
P.O. Box 140  
136 Highway 48  
Summerville, GEORGIA 30747-Plaintiff  
VS.  
JONES, JIMMY LEE; WERNER ENTERPRISE, INC.Name and Address of Party to be Served.  
WERNER ENTERPRISE, INC.  
2985 GORDY PARKWAY, 1ST FLOOR  
MARIETTA, GEORGIA 30006Defendant  
DBA C O CORPORATE CREATIONS NETWORK, INC.

Garnishee

## SHERIFF'S ENTRY OF SERVICE

PERSONAL

I have this day served the defendant \_\_\_\_\_ personally with a copy of the within action and summons.

NOTORIOUS

I have this day served the defendant \_\_\_\_\_ by leaving a copy of the action and summons at his most notorious place of abode in this County.

CORPORATION

Delivered same into hands of \_\_\_\_\_ described as follows:  
age, about \_\_\_\_\_ years; weight \_\_\_\_\_ pounds; height, about \_\_\_\_\_ feet and \_\_\_\_\_ inches, domiciled at the residence of defendant.

TACK &amp; MAIL

Served the defendant \_\_\_\_\_ a corporation  
 by leaving a copy of the within action and summons with \_\_\_\_\_ in charge of the office and place of doing business of said Corporation in the County.

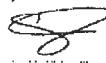
NONEST

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, first class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

Diligent search made and defendant \_\_\_\_\_ not to be found in the jurisdiction of this court.

This \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_

Deputy

ID# 2022-0017115-CV  
EFILED IN OFFICE  
CLERK OF SUPERIOR COURT  
COBB COUNTY, GEORGIA  
**22100849**  
Ann B. Harris - 56  
FEB 08, 2022 08:56 AM  
  
Connie Taylor, Clerk of Superior Court  
Cobb County, Georgia

IN THE **SUPERIOR COURT OF COBB COUNTY**  
**STATE OF GEORGIA**

*LATERICA FINLEY*

Plaintiff,

v.

*JIMMY LEE JONES, and WERNER  
ENTERPRISE, INC.,*

Defendants.

CIVIL ACTION

FILE NO.: \_\_\_\_\_

**JURY TRIAL DEMANDED**

**COMPLAINT**

COMES NOW *LATERICA FINLEY*, plaintiff, and makes and files this complaint against defendants *JIMMY LEE JONES, and WERNER ENTERPRISE, INC.* as follows:

**PARTIES AND JURISDICTION**

1.

Plaintiff *LATERICA FINLEY* resides at *146 Abner Drive, Cedartown, GA 30125*, and is subject to the jurisdiction of this court.

2.

Defendant *JIMMY LEE JONES* resides at *4397 Bells Chapel Road, E., Atkins, AR 72823-5919*, and may be served with a copy of the summons and complaint at this address. Service of Process is made pursuant to O.C.G.A. § 9-10-94.

3.

*WERNER ENTERPRISE, INC.* is a *FOREIGN* corporation existing under the laws of *GEORGIA* with its principal place of business in *NEBRASKA* and may be served through its registered agent *CORPORATE CREATIONS NETWORK, INC.* at *2985 Gordy Parkway, 1<sup>st</sup> floor, Marietta, GA 30006*, and is subject to the jurisdiction of this court.

4.

Jurisdiction and venue are proper in this court.

#### BACKGROUND

6.

On or about *November 19, 2020*, plaintiff was driving her vehicle on *I-75 South near the intersection of Pine Grove Road in Catoosa County, Georgia*.

7.

Defendant *JIMMY LEE JONES* was driving his vehicle on *I-75 South near the intersection of Pine Grove Road in Catoosa County, Georgia*.

8.

On this date, defendant *JIMMY LEE JONES* was operating his commercial vehicle on behalf of defendant *WERNER ENTERPRISE, INC.*

9.

*Defendant JIMMY LEE JONES was traveling on I-75 South near the intersection of Pine Grove Road in Catoosa County, Georgia, when he attempted to change lanes and struck the passenger side of Plaintiff's vehicle with the left rear hubcap on the trailer he was pulling.*

10.

As a result of the collision, plaintiff suffered severe and permanent injuries.

**COUNT 1**  
**NEGLIGENCE**

11.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 10 above as if fully restated.

12.

Defendant *JIMMY LEE JONES* was negligent in the following manner:

- (a) *Improper lane change.*
- (b) *Failure to maintain proper lookout.*

13.

Defendant *JIMMY LEE JONES* was negligent in making an improper lane change and failing to maintain a proper lookout for plaintiff's vehicle and colliding with plaintiff's vehicle.

14.

Defendant *JIMMY LEE JONES* negligence is the sole and proximate cause of the collision, and plaintiff's resulting injuries.

**COUNT 2**  
**IMPUTED LIABILITY**

15.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 14 above as if fully restated.

16.

At the time of the subject collision, defendant *JIMMY LEE JONES* was under dispatch for defendant *WERNER ENTERPRISE, INC.*

17.

At the time of the subject collision, defendant *JIMMY LEE JONES* was operating his vehicle on behalf of defendant *WERNER ENTERPRISE, INC.*

18.

Defendant *WERNER ENTERPRISE, INC.* is an intrastate or interstate company, and pursuant to federal and state laws, is responsible for the actions of defendant *JIMMY LEE*

*JONES* in regard to the collision described in this complaint under the doctrine of lease liability, agency or apparent agency.

**COUNT 3**

**NEGLIGENT HIRING, TRAINING & SUPERVISION**

19.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 18 above as if fully restated.

20.

Defendant *WERNER ENTERPRISE, INC.* was negligent in hiring defendant *JIMMY LEE JONES* and entrusting him to drive a commercial vehicle.

21.

Defendant *WERNER ENTERPRISE, INC.* was negligent in failing to properly train defendant *JIMMY LEE JONES*.

22.

Defendant *WERNER ENTERPRISE, INC.* was negligent in failing to properly supervise defendant *JIMMY LEE JONES*.

23.

Defendant *WERNER ENTERPRISE, INC.*'s negligence in hiring defendant *JIMMY LEE JONES* and entrusting him with driving a commercial vehicle and failing to train and supervise him properly was the sole and proximate cause of the collision, and plaintiff's resulting injuries.

**COUNT 4**

**DAMAGES**

29.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 28 above as if fully restated.

30.

As a result of defendants' negligence, plaintiff suffered *neck pain, back pain, headaches, concussion, and Traumatic Brain Injury.*

31.

As a result of defendants' negligence, plaintiff has incurred past medical expenses and will continue to incur future medical expenses (See Exhibit "A" attached).

32.

As a result of defendants' negligence, plaintiff has been unable to work and has a claim for past and future lost wages.

33.

Defendants' negligence is the sole and proximate cause of plaintiff's injuries.

WHEREFORE, plaintiff prays that she has a trial on all issues and judgment against defendants as follows:

- a. That plaintiff recovers the full value of past and future medical expenses and past and future lost wages in an amount to be proven at trial;
- b. That plaintiff recovers for physical and mental pain and suffering in an amount to be determined by the enlightened conscience of a jury;
- c. That plaintiff recovers punitive damages in an amount to be determined by the enlightened conscience of a jury; and
- d. That plaintiff recovers such other and further relief as is just and proper.

This 8th day of February, 2022.

*LAW OFFICE, PC*

By: \_\_\_\_\_

*SANFORD M. HILL*

Georgia Bar No. 354505

*Attorney for Plaintiff*

*P.O. BOX 140  
136 HIGHWAY 48  
SUMMERTON, GA 30747  
706-859-7777  
Fax: 706-857-0099  
E-mail: SANFORDHILL@WINDSTREAM.NET*

LATERICA FINLEY

**SPECIALS**

<b>FLOYD MEDICAL CENTER</b> P.O. BOX 233 ROME, GA 30162-0233 706-509-6000 ACCOUNT #: 20324-00946	<b>\$3,501.00</b>
<b>ETOWAH EMERGENCY PHYSICIANS</b> P.O. BOX 740937 ATLANTA, GA 30374-0937 678-507-0333 ACCOUNT #: 11070224V14272	<b>\$645.00</b>
<b>ROME RADIOLOGY GROUP PA</b> P.O. BOX 3253 INDIANAPOLIS, IN 46206-3253 844-265-1935 ACCOUNT #: 40180-RRG1	<b>\$600.00</b>
<b>LESLIE A. TUCKER, D.C.</b> 500 CEDAR AVE SW ROME, GA 30161-6714 706-290-0408 ACCOUNT #: 7464	<b>\$6,455.00</b>
<b>TBI DIAGNOSTIC CENTERS OF GEORIGA</b> 2 WEBSTER ST NW ROME, GA 30165 678-277-5022	<b>\$2,328.26</b>
<b>NEUROPSYCH CENTERS OF GEORGIA</b> 368 WEST PIKE ST. LAWRENCEVILLE, GA 30046 678-538-9314	<b>\$5,050.00</b>
<b>TOTAL:</b>	<b>\$18,579.26</b>

Exhibit "A"

**FEB 10 2022**